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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
Plaintiff,
13
v.
14 RICHARD FRED DITTMER II,
15
Defendant.

Case No. 2:18-cr-00302-JAD-NJK

STIPULATION TO CONTINUE
MOTION DEADLINES
(Fourth Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Rebecca Clinton, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Richard Fred
21 Dittmer, II, that the pretrial motion deadline be continued thirty (30) days.

22 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
23 shall have to and including July 17, 2019, to file any and all pretrial motions and notice of
24 defense, currently due June 17, 2019.
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1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including July 31, 2019, to file any and all responsive pleadings, currently due
3 July 1, 2019.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
5 shall have to and including August 7, 2019, to file any and all replies to dispositive motions,
6 currently due July 8, 2018.

7 1. Defense counsel needs additional time to review discovery and conduct
8 investigation in this case in order to determine whether there are any pretrial issues that must
9 be litigated and whether the case will ultimately go to trial or will be resolved through
10 negotiations.

11 2. The defendant is not incarcerated and does not object to the continuance.

12 3. The parties agree to the continuance.

13 4. The additional time requested herein is not sought for purposes of delay, but
14 merely to allow counsel for defendant sufficient time within which to be able to effectively and
15 complete investigation of the discovery materials provided.

16 5. Additionally, denial of this request for continuance could result in a miscarriage
17 of justice.

18 This is the fourth stipulation to continue filed herein.

19 DATED this 18th day of June, 2019.

20 RENE L. VALLADARES
21 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

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23 By /s/ Margaret W. Lambrose
24 MARGARET W. LAMBROSE
Assistant Federal Public Defender

By /s/ Rebecca Clinton
REBECCA CLINTON
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 RICHARD FRED DITTMER II,

7 Defendant.

Case No. 2:18-cr-00302-JAD-NJK

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

9
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court finds that:

13 1. Defense counsel needs additional time to review discovery and conduct
14 investigation in this case in order to determine whether there are any pretrial issues that must
15 be litigated and whether the case will ultimately go to trial or will be resolved through
16 negotiations.

17 2. The defendant is not incarcerated and does not object to the continuance.

18 3. The parties agree to the continuance.

19 4. The additional time requested herein is not sought for purposes of delay, but
20 merely to allow counsel for defendant sufficient time within which to be able to effectively and
21 complete investigation of the discovery materials provided.

22 5. Additionally, denial of this request for continuance could result in a miscarriage
23 of justice.

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IT IS FURTHER ORDERED that the parties shall have to and including July 31, 2019 to file any all responses.

DATED this 19th day of June, 2019.


NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE